UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA Alexandria Division

J	A	N	ΙE	D	O	E.
v.			·	$\boldsymbol{\mathcal{L}}$	\sim	,

Plaintiff,

v.

Case No. 1:21-cv-1150-AJT/JFA

FAIRFAX POLICE OFFICER #1, ET AL.

Defendants.

<u>DEFENDANTS' MEMORANDUM IN SUPPORT</u> <u>OF MOTION TO FILE DOCUMENT UNDER SEAL</u>

This Memorandum is respectfully submitted in support of Defendants' Motion to File Document Under Seal (the "Motion"). The Defendants' Opposition to Plaintiff's Motion *in Limine* is the subject of the Motion.

In support of this motion, the Defendants represent that the opposition memorandum is covered by the Court's protective order of May 18, 2022 (ECF 63), which provides for such filing so as to preclude public access to certain material and information discovered from defendants, the Fairfax County Police Department, and this Court per order of Judge O'Grady in the case *United States v. Sanchez*, No. 1:19-cr-65-LO (ECF No. 59).

The Defendants will file an unsealed, redacted version of the document pursuant to L.R. 5 and the Court's Rule 16(b) scheduling order, ECF 59. The Defendants have redacted from their opposition memorandum only those portions that they believe are appropriate to be filed under seal in accordance with the Court's orders and Local Civil Rule 5. An un-redacted version of the opposition memorandum is being submitted to the Court in hard copy.

Pursuant to the Local Civil Rule 5(C), Counsel for the Defendants engaged in a good faith effort to redact or seal only as much as necessary from the material referenced above.

Respectfully submitted,

JAMES BAUMSTARK VINCENT SCIANNA EDWIN C. ROESSLER

ELIZABETH D. TEARE COUNTY ATTORNEY

By: /s/

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Counsel for James Baumstark, Vincent Scianna, and Edwin C. Roessler

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of November, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a true copy of the foregoing to the following:

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